

Remarks:**Status of the Claims**

Claims 18-43, 45-46 and 48-55 are pending in the application. Claims 21-23, 31-43, 45, 46 and 48-53 have been withdrawing from consideration. Claims 18 is the only independent claim for consideration. Since claim 18 is a generic claim to spices claims 21-23, when claim 18 is found allowable, the merits of claims 21-23 should be examined.

Claim Rejections under 35 USC 103

Claims 18, 19, 20, 24, 26-30 and 54 are rejected under 35 USC 103(a) as being unpatentable over Gabai (US Patent No. 6,773,344) in view of Aggarwal (US Patent No. 7,013,286). Applicants respectfully submit that the present invention is not obvious over the cited references.

First, the Examiner admitted that Gabi did not explicitly disclose that the user is requesting such discounts but nonetheless determined that Gabai disclosed such requests could be done by a mobile user device via the interactive TV system (citing the description in col. 30, lines 29-36). Applicants respectfully disagree. The cited disclosure simply states that a user may use a remote control unit provided by Scientific-Atranta, Inc. to request coupons. The cited disclosure does not relate in any way to any use of the cell-phone toy and thus has nothing to do with the use of the cell-phone toy by a user to request coupons. Applicants therefore submit that Gabai is silent about the mobile terminal which comprises, among other recited claim limitations, "the request generator configured to generate a user request for incentive information for promoting a service found in the broadcast information."

Second, the Examiner determined that Gabai disclosed the request sender configured to transmit the user request for incentive information, which is receivable by a management system located outside the mobile terminal (citing the disclosure in col. 20, lines 58-61). Again, Applicants respectfully disagree. The cited disclosure states that the interactive cell-phone toy can generate discounts or coupons, which can be used by its user(s) to the users' economic advantage. The cited disclosure simply states that the interactive toy can generate coupons and does not state or suggest that the

interactive toy further transmits the generated coupons.

Third, the Examiner determined that Gabai disclosed the claim limitation of “an incentive information receiver configured to receive the incentive information returned from the management system.” In the claim limitation, the incentive information has to be information which is returned from the management system. In other words, the incentive information recited in the claims has to be information which is sent from the management system in response to a request from the user. Gabai states that sales promotion content is typically sent to interactive toys from sales promotion companies via an Interactive Toy Server (col. 38, lines 61-63). Please note, however, that Gabai is silent about whether or not the sales promotion content is sent to the toy in response to a request from the user. Applicants believe that the sales promotion content in Gabai is not information which is sent to the toy in response to a user’s request, because as discussed above and as the Examiner admits, Gabai does not disclose or suggest that the user requests discounts, using the interactive toy.

Nor does Aggarwal disclose or teach the above discussed three claim limitations. Aggarwal voluntarily, or at no request from users, prepare coupons and present them to users who are browsing marketplace sites on the Internet. Aggarwal states that “a customer navigates...an electronic marketplace...a distribution agent residing on ... the marketplace presents the customer a potential offer... After completing the prerequisites...he or she is presented with actual coupon...” (col. 9, lines 30-46). Therefore, Aggarwal is silent about “request generator configured to generate a user request for incentive information for promoting a service found in the broadcast information” because the customer is not requesting a coupon in Aggarwal.

Aggarwal is also silent about “request sender configured to transmit the user request for incentive information, which is receivable by a management system located outside the mobile terminal,” because again the customer is not requesting a coupon but passively receives a coupon.

Further, Aggarwal is silent about “incentive information receiver configured to receive the incentive information returned from the management system,” because the coupon received by the customer is not a coupon returned or a coupon sent in response to the customer’s request, since no one is requesting a coupon in Aggarwal.

For the reasons set forth above, the present invention is not obvious in view of Gabai and Aggarwal, either individually or in combination. Reconsideration is respectfully requested.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Tadashi Horie', is written over a horizontal line.

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